

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**SEIKO EPSON CORPORATION,**  
a Japan corporation; **EPSON AMERICA, INC.,**  
a California corporation; and **EPSON  
PORTLAND INC.**, an Oregon corporation,

Plaintiffs,

v.

**CIS SYSTEMS, INC**, an Illinois corporation;  
**ABSOLUTE INKJET  
INCORPORATED**, an Illinois corporation;  
**ANTHONY K. MARTIN**, an individual;  
and **JOSEPH J. ASCARIDIS**, an individual,

Defendants.

Civil Action No. 1:18-cv-06586

Honorable John Z. Lee

**JOINT MOTION FOR ENTRY OF STIPULATED FINAL [*PROPOSED*] CONSENT  
JUDGMENT AND PERMANENT INJUNCTION ORDER AS TO CIS SYSTEMS, INC.,  
ABSOLUTE INKJET INCORPORATED, ANTHONY K. MARTIN, AND  
JOSEPH J. ASCARIDIS**

The Parties, by and through their respective counsel, jointly move for entry of the Stipulated Final [Proposed] Consent Judgment and Permanent Injunction Order as to Defendants CIS Systems, Inc., Absolute Inkjet Incorporated, Anthony K. Martin, and Joseph J. Ascaridis, attached hereto as Exhibit A.

Pursuant to this Court's procedures for "Submitting a Proposed Order, Agreed or Otherwise, for Electronic Entry by the Judge," the Proposed Consent Judgement and Permanent Injunction Order is also being submitted to the Court, via e-mail, in Microsoft Word format.

Dated: September 25, 2020

Respectfully submitted,

/s/ Christopher J. Fahy

Christopher J. Fahy, Esq. (Bar No. 6286130)  
**K&L Gates LLP**  
70 W. Madison Street, Suite 3100  
Chicago, IL 60602  
Telephone: (312) 807-4324  
Facsimile: (312) 827-8000  
christopher.fahy@klgates.com

Tigran Guledjian, Cal. Bar # 207613

*pro hac vice*

Richard H. Doss, Cal. Bar # 204078  
*pro hac vice*

**Quinn Emanuel Urquhart & Sullivan, LLP**  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
tigranguledjian@quinnmanuel.com  
richarddoss@quinnmanuel.com

*Attorneys for Plaintiffs Seiko Epson Corp.,  
Epson America, Inc., and Epson Portland Inc.*

/s/ Oliver D. Yang

Dean D. Niro, Esq (Bar No. 6208064)  
Oliver D. Yang, Esq. (Bar No.6304354)  
**Vitale, Vickrey, Niro, Solon & Gasey, LLP**  
311 S. Wacker Dr., Suite 2470  
Chicago, IL 60606  
Telephone: (312) 236-0733  
Facsimile: (312) 236-3137  
dniro@vvnlaw.com  
oyang@vvnlaw.com

*Attorneys for Defendants CIS Systems, Inc.,  
and Absolute Inkjet Inc.*